

# **Appendix A**

## **Supporting Documents**



## **Appendix A**

### **Supporting Documents**

WINCO letter, Wrg-17-85, "PCB Contaminated Soil in ICPP Substation", June 3, 1985

WINCO letter, Pal-15-85, "Procedure for Cleanup of PCB Contaminated Material", June 26, 1985

Construction Interface Document "Remove PCB/Radioactive Contaminated Soil and XFR Pad 2", July 10, 1985

"Guidelines for the Cleanup of the PCB Spill From the Transformer near CPP-613"

Raunig, Dennis E., LMITCO, to Roger K. Jones, LMITCO, February 17, 1998, "Disposition of an Investigative Derived Waste (IDW) – DER-001-98," File Code 6105.



**Westinghouse Idaho  
Nuclear Company, Inc.**

Wrg-17-85

From : F. K. Wrigley  
Phone : 6-1085  
Date : June 3, 1985  
Subject: PCB Contaminated Soil in ICPP Substation

To : R. J. Secondo, DOE-ID  
C. E. Clark, DOE-ID  
G. H. Hanson, EG&G  
T. M. Nash, M-K  
P. J. Hult  
K. Krivanek

L. C. Lewis  
W. C. Mallory  
W. G. Mansfield  
R. J. Marcinko  
W. P. Palica  
T. F. Pointer

cc: H. U. Johansen  
F. K. Wrigley - 2  
Project Central Files

The attached guidelines have been prepared by R. J. Secondo for handling the PCB contaminated material in the ICPP Substation. Please review and plan to attend a meeting on Thursday, June 6 at 11:00 a.m. in CPP-652 to review comments and suggestions. After the meeting, WINCO Nuclear and Industrial Safety will prepare directions for handling the material based on discussions and decisions made at this meeting.

*F. K. Wrigley*

F. K. Wrigley, Project Manager  
Line Item Projects

/cjc

Attachment

**LINE ITEM PROJECTS  
CENTRAL FILE**

NP  
— RECEIVED —  
JUN 07 1985  
LINE ITEM PROJECTS  
Proj: UREP-18  
File Code: 5.7  
Approved for Central File  
☐ Yes  
☐ No  
Copies To: \_\_\_\_\_  
\_\_\_\_\_

*Seaged*

NP  
UREP-18  
5.7

UREP Substation  
PCB Contamination

Issues:

- Radioactive contaminated soil.
- PCB contaminated soil.
- PCB contaminated concrete.
- Appropriate samples, hold points, etc., for accomplishing goals.

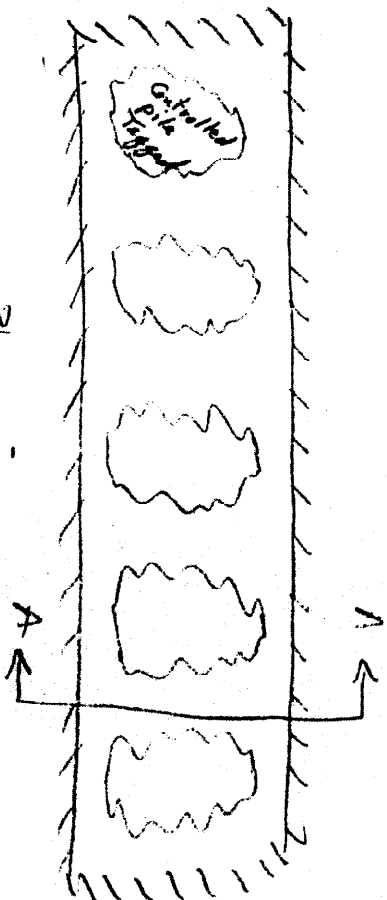
Goals:

- Separate radioactive soil such that it shall not go off site.
- Sampling techniques and measurements for PCB shall be equivalent to EPA standards.
- Remove all soil above EPA limit of 10 ppm as PCB contaminated.
- Below 10 ppm PCB containing soil can be left as is.

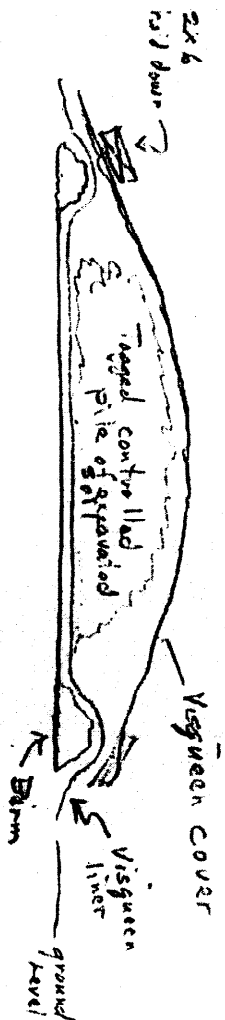
Food For Thought:

1. Excavate the top layer of radioactive contaminated soil - approximately 6" and box per RWMC requirements. (It is also PCB contaminated.)
2. Chip off the PCB contaminated concrete from the existing transformer pad. Assure this concrete material is not radioactive contaminated for off-site shipments. If radioactive contaminated, then it should go in the same container with the top layer of soil and ship to RWMC.
3. Excavate for the new transformer foundation - Control this this excavation activity by the following actions:
  - a. This excavated dirt will require a controlled temporary storage system (see Sketch No. 1).
  - b. As this dirt is excavated, it shall be identified by the location it came from and organized in controlled piles in the protected system.
  - c. Representative samples shall be taken for each controlled pile.
  - d. Analysis shall be done per the EPA procedures so that readings will correlate to the EPA limits of 10 ppm.

- e. When the excavation is complete, additional sampling shall be done in the bottom and sides of the excavation to confirm that no soil is contaminated above the EPA limit of 10 ppm (see Sketch No. 2).
  - f. The project is on hold at this point, waiting for the sample analysis results.
4. If all samples come back less than 10 ppm per EPA's limit, then the project can proceed and all dirt excavated can be used for back fill. (Note: Except for the top layer that was boxed, left over material from this excavation shall be disposed of appropriately - clean per CPP standard; if there is PCB traces and there is room available in the RWMC box, it can be placed there. If samples come back greater than 10 ppm, then soil shall be boxed for disposal and handled as PCB contaminated soil.)

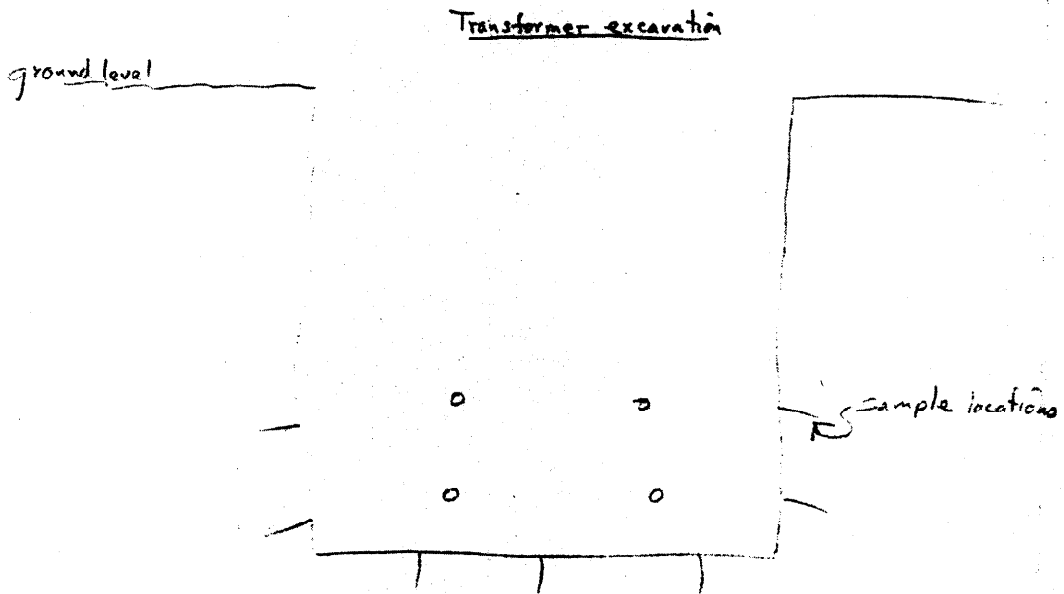


22-141 50 SHEETS  
22-142 100 SHEETS  
22-143 200 SHEETS



Sketch No ①

50 SHEETS  
100 SHEETS  
200 SHEETS  
25-111  
25-112  
25-113



Sketch No ②





Westinghouse Idaho  
Nuclear Company, Inc.

Box 4000  
Idaho Falls, Idaho 83403

Pal-15-85

June 26, 1985

Mr. R. J. Secondo, Chief  
Process and Waste Management Branch  
Engineering & Construction  
Management Division  
Idaho Operations Office, DOE-ID  
550 Second Street  
Idaho Falls, Idaho 83401

Dear Mr. Secondo:

Subject: Procedure for Cleanup of PCB Contaminated Material

This will confirm that a procedure for clean up of PCB contaminated material (UREP Substation Phase II) was hand carried to you on June 25, 1985.

If you have any questions, please call me at 6-1086.

Very truly yours,

*William P. Palica*

W. P. Palica, Project Engineer  
Line Item Projects

/cjs

bcc: R. J. Bliss  
P. J. Hult  
H. U. Johansen  
F. K. Wrigley  
W. P. Palica - 2  
Project Central Files

LINE ITEM PROJECTS  
CENTRAL FILE

NP

RECEIVED —  
JUN 26 1985

LINE ITEM PROJECTS

Proj: UREP/15

File Code: 19

Approved for Central File  
☒ Yes  
☐ No

Copies To: \_\_\_\_\_

*Logan*



ID F-6400.A (Rev. 04-82)  
(Ref. ID: 6400.A)

U.S. DEPARTMENT OF ENERGY  
IDAHO OPERATIONS OFFICE  
**CONSTRUCTION INTERFACE DOCUMENT**

LINE ITEM PROJECTS

**CENTRAL FILE**

lga

1. Addressee and Location <i>T.M. Nash CPP-69B</i>	2. Project Title <i>UREP SS Phase II</i>	3. Date <i>7-10-85</i>	4. CM Proj. No. <i>5-2247</i>	5. CID No. <i>22</i>	6. ICWA No. <i>85-20</i>
7. Originator and Location <i>P.J. Hult CPP-624</i>	8. Phone <i>6-3913</i>	9. Organization <i>Projects</i>	10. Answer By <i>7-17-85</i>	11. References: Drawings, Specifications <i>ATTACHED</i>	
12. Subject <i>Remove PCB/Radioactive Contaminated Soil and XFR Pad (2)</i>					
13. Description of Problem & Recommended Solution <input type="checkbox"/> Clarification <input checked="" type="checkbox"/> Change  <i>Remove PCB/Radioactive soil and transformer pad in accordance with the attached "Guidelines for the Cleanup of the PCB Spill From the Transformer Near CPP-613."</i>					
14. Disposition <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved <input type="checkbox"/> Approved as Noted  ECR No. <i>N/A</i>			Originator <i>P.J. Hult</i> 7-10-85 Signature/Date		
Project Manager <i>P.J. Hult</i> 7-10-85 Signature/Date					
15. DISPOSITION: Field Change Order <input type="checkbox"/> Subcontract No. _____ Change Order No. _____ Pursuant to the changes article the subcontractor is hereby directed to proceed as follows:					
Construction Engineer/Date		Subcontract Administrator/Date		Subcontractor Representative/Date	

(Replaces ID F-128)

# INSTRUCTION - PREPARATION OF CID- ID F-6400.A

1. Name and INEL Location (eg., CFA 670, HQ 202, CPP 637, MTR 603) person that is to receive the CID. CID's should be addressed to:  
Construction Engineer - When to Construction Management  
Project Manager/Engineer - When to Operating Contractor
2. Name of Project.
3. Date that CID is originated.
4. Project identification number assigned by construction management contractor.
5. Sequential number assigned by construction management contractor.
6. The intercontractor work authorization number assigned to the job by the operating contractor.
7. Name and location of originator.
8. Phone number of originator.
9. Originator's organization.
10. Date that response to CID is required.
11. Drawings, specifications, letters that may aid addressee in disposition of CID.
12. Clear, concise, summary description of problem.
13. Indicate the type and reasons for problem and give a detailed description.
14. Originator prepares recommendation and solutions. Indicate if clarification in #14 & #15. Recipient must sign off approval.
15. Copy 3 will be given to subcontractor representative. Copy 2 for construction files, original subcontract administrator file. Construction Engineer must sign upon preparation SA on receipt. Subcontractor upon final disposition and prior to distribution.

DISTRIBUTION	NAME	LOCATION
C.M. Site Mgr.	<i>Wicks</i>	
O.C. Proj. Mgr.	<i>Wangley</i>	
O.C. Field Coord	<i>Hunt</i>	
O.C. Qual. Engr.	<i>Brown</i>	
O.C. Const. Insp.	<i>Basel</i>	
DOE I.D.	<i>Secundo</i>	
Subcontractor - Home Office	<i>Pratt Electric</i>	
Other	<i>Palmer, Nelson</i>	
	<i>Nash, Smith</i>	
	<i>Crain</i>	
	<i>Yak, Benjamin, Kato</i>	

Cost/Time Estimate
<input type="checkbox"/> Attached
<input checked="" type="checkbox"/> Not Required
<input type="checkbox"/> Project Manager Approval Required

## GUIDELINES FOR THE CLEANUP OF THE PCB SPILL FROM THE TRANSFORMER NEAR CPP-613

These guidelines represent the procedures required for the cleanup of a PCB spill near CPP-613 and also procedures for sampling and analysis of this spill. Emphasis will be placed on the sampling and analysis methods used to verify that the PCB spill site has been properly decontaminated.

Cleanup of the site contaminated with fluid containing polychlorinated biphenyls (PCBs) which has spilled from the transformer will consist of the following activities: (I) preparing guidelines for the cleanup; (II) cleaning up the spill site and restoration of the site; (III) sampling; (IV) analysis; (V) inspection of the site, and (VI) final documentation. General guidelines for performing each of these activities are presented in this document.

After the spill site had been secured and the boundaries of contamination had been determined, a set of guidelines had to be prepared to direct the spill cleanup. The spill cleanup activities will include:

- . Health and safety precautions
- . Physical removal of contaminated gravel
- . Decontamination of equipment
- . Removal of the transformer pad
- . Additional decontamination procedures
- . Sampling
- . Analysis.

### I. CLEANUP GUIDELINES

#### A. Health and Safety

Human exposure to polychlorinated biphenyls (PCBs) will be minimized to protect the health and safety of workers involved in the sampling and spill cleanup activities. Sampling personnel will be required to obtain a Hazardous Work Permit for each shift. Excavation personnel will be required to obtain a Construction Safe Work Permit for each shift. ~~These permits will be prepared by Industrial Safety and will include the necessary protective requirements. WINGCO will~~ *SPECIAL* provide the necessary protective clothing, eye protection, and respirators *will be PROVIDED*

ENGINEER AND  
PROVIDED BY the  
WINCO

A preconstruction meeting will be required of all personnel who will be involved with the removal of the PCB-contaminated material. The meeting will cover general health and safety hazards associated with PCB contamination and the appropriate safeguards and work practices to be followed. This training will be coordinated through the WINCO Construction Production Training Section.

#### 1. Protective Clothing

Protective clothing that is impervious to PCBs will be worn in situations where workers may come into contact with PCBs or PCB-contaminated materials. This clothing consists of impervious paper-like coveralls (Saranex Tyvek-laminated coveralls), plastic overshoes, rubber-like gloves (such as Viton), and/or an impervious apron. After completion of PCB handling and cleanup operations, the disposable work clothing will be removed immediately. The contaminated clothing will be placed in a leak-proof container and properly disposed of as PCB-contaminated material.

#### 2. Eye Protection

Chemical safety goggles will be worn during any operation in which liquid PCBs are present. Safety glasses with side shields will be worn during any operation in which solid PCBs are present. If liquids or solids containing PCBs contact the eyes, the eyes shall be irrigated immediately with large quantities of water and then be examined by a physician or other responsible medical personnel. Portable eyewash units will be located at the cleanup site.

#### 3. Respiratory Protection

Based on the preliminary laboratory analysis, it has been determined by Industrial Safety that no respiratory protection is required for excavation and sampling activities. However, respirators must be worn if breakup of the transformer pad is necessary but will be necessary only during that portion of the activities. The recommended respirator for an outside PCB spill is a full-face respirator with an acid/gas/organic vapor cartridge with a high-efficiency prefilter.

#### B. General Health and Safety

- Facilities for shower baths will be provided for workers exposed to PCBs. After working with PCBs, workers will shower before changing into street clothing.
- Workers exposed to PCBs will be advised to wash their hands and exposed skin before eating, drinking, smoking, or using toilet facilities.
- Food, drink, or smoking materials will not be permitted in areas where PCBs are handled.

- . To reduce injuries, hard hats will be worn, and safe work practices will be followed.

## II. CLEANING UP SPILL SITE

Since the spill site has been secured, members of the N&IS and Technical Departments have taken soil samples and have run analyses to determine the boundaries of contamination. The transformer has been removed and the spill site is now ready to be cleaned up. Spill cleanup will include, but not necessarily be limited to, the following activities:

- . Development of a schedule of activities
- . Physical removal of contaminated gravel
- . Temporary covering of decontamination areas
- . Removal of the concrete transformer pad
- . Backfilling
- . Decontamination of equipment
- . Sampling
- . Analysis.

Cleanup activities will proceed as soon as possible. Although rapid cleanup is a key objective, the existence of radiological contamination in conjunction with PCB contamination has delayed the cleanup activities. The aerial extent of the radiological contamination had to be determined before excavation activities could begin. However, any isolated radiological contamination will be cleaned up before excavation activities. Additional delays will be caused by avoiding cleanup during rainy weather, at night, or when wind speed is greater than 25 mph. During a rain, contaminated soil has a greater chance to be spread by runoff, expanding the contaminated area. In addition, spills are difficult to identify at night or when the ground is wet with water. Wind speeds greater than 25 mph increase the chance of soil becoming airborne during cleanup activities, spreading contamination. If the spill cleanup is in progress when darkness sets in or when high winds or rainfall occurs, the area that is visibly contaminated will be covered by weighted plastic and the cleanup activities delayed. The plastic will be surveyed by HP personnel and if the plastic is radioactively contaminated it will be boxed as mixed waste. If the plastic is not radioactively contaminated it will be disposed of as PCB-contaminated waste.

### A. Removal of Contaminated Gravel

The general rule for removing PCB-contaminated gravel is to use a horizontal skimming technique, rather than a vertical digging technique. However, in spills which are concentrated around the base of a concrete pad rather than those distributed over a broad surface area, deeper digging is required. Soil shall be removed to at least eight (8) inches below the deepest signs of contaminated oil or contamination greater than or equal to 10 ppm. The excavation will

also extend laterally at least three (3) feet beyond the area that is visibly contaminated. This depth will be achieved through scraping off the first few inches, cleaning the shovel, scraping of the next few inches, and cleaning off the shovel to prevent cross contamination.

1. The following procedure for removing the contaminated gravel will be followed after obtaining a proper excavation and Hazardous Work Permit through the Industrial Safety section. Soil samples will be obtained by N&IS approximately every 1-1.5 ft.

Construction Engineer  
in conjunction with  
The

The top 6 inches of gravel on the east side of the transformer pad shall be removed and boxed as a mixed waste (radioactive and PCB-contaminated).

- These boxes shall be labeled as both toxic (PCB-contaminated) and radioactive waste.
- This mixed waste shall be placed on a sheet of Visqueen and stored in a location such that rain, snow, etc., drains away from the storage site; this location should also have a roof, walls, and a floor to protect the boxes from the weather. The storage area should be well posted and locked if possible. This mixed waste will be stored by WINCO until its final disposition is determined. The final storage location must be approved by N&IS.
- Boxes must be filled to maximum capacity to minimize the number of boxes generated.
- Boxes must meet N&IS approval and have double liners installed before use. Each liner must be sealed after filling.
- All equipment used in this portion of cleanup activities will be decontaminated to prevent cross contamination.

2. The top 6 inches of gravel on the north, west, and south sides of the transformer pad shall be removed and stockpiled for use as backfill. This gravel contains radioactivity too high for disposal at the CFA landfill and too low for disposal at the RWMC. This low-level radioactively contaminated soil will be piled north of CPP-613 on plastic sheeting and covered by plastic sheeting until reused. The plastic sheeting will be surveyed by HP personnel and if sheeting is radioactively contaminated it will be stored with the mixed waste. If the plastic sheeting is not radioactively contaminated it will be disposed of as PCB-contaminated waste. All equipment used in this portion of cleanup activities will be decontaminated to prevent cross contamination.

3. The gravel on the east side of the concrete pad between 6 inches and 18 inches deep shall be removed and placed in barrels as a

snippable PCB toxic material. These barrels will be removed from the ICPP within 30 days from the start of cleanup by others

- This gravel will be removed using a skimming technique to allow adequate sampling.
  - These barrels can be shipped off-site to a hazardous waste landfill provided all N&IS safety support procedures are met. ~~by~~ THE BARRELS will be removed by others
  - This soil will be disposed of by Chem-Security System, Inc.
  - All equipment used in this portion of cleanup activities will be decontaminated to prevent cross contamination.
4. The soil below 18 inches on the east side of the concrete pad will be removed in 1-foot increments and stockpiled on Visqueen underlain by 12 inch-high berms on all four sides. These lifts will be individually segregated on the Visqueen and labeled and sampled by N&IS personnel. These piles will be covered by Visqueen at the end of each work day to prevent water infiltration into the soil below the berm. The Visqueen will be disposed of as PCB-contaminated waste. r
- After analysis by the Radiochemistry group, the individual lifts will be disposed of in accordance with EPA Region 10 guidelines:
    - <10 ppm PCB can be backfilled
    - >10 ppm PCB must be disposed of off-site.
  - Disposal methods for the >10-ppm soil will follow the procedure outlined above for PCB-contaminated soil.
  - The <10-ppm soil will be backfilled according to procedures for radioactively contaminated soil.
  - All equipment used in this portion of cleanup activities will be decontaminated to prevent cross contamination.
5. All soil below 6 inches deep on the north, south, and west sides of the transformer pad contains no significant radioactivity or PCB and can be considered clean. This soil can be used as backfill without restrictions.

#### B. Temporary Cover for Decontaminated Areas

At the end of each day when the soil is being removed, the crew will cover the cleaned areas with fresh polyethylene sheets which will be weighted down in place to prevent contamination spread. The polyethylene sheets will be disposed of as PCB waste unless it is determined by HP to be radioactively contaminated. If it is radioactively contaminated the sheets must be stored with the mixed



waste. Also, the barricading and warning notices must remain in place so as to restrict public access further and to warn the public of the excavation.

#### C. Removal of Concrete Transformer Pad

The transformer pad will be removed and disposed of as PCB-contaminated waste rather than by cleaning it because the effort involved in a cleanup would be more expensive than would replacement. Also, cleanup may not be sufficient to decontaminate the pad fully.

The transformer pad will be removed from the hole and, depending on size constraints, may be broken up before being transported to an interim storage site selected by Projects and agreed to by N&IS. If it is necessary to break up the pad, a concrete saw or similar equipment will be used for this procedure. Also, respirators must be worn by all excavation and construction personnel during this activity. A plastic enclosure will be built around the pad before any cutting activities.

The interim storage site must provide weather protection if necessary until the pad is shipped off-site (within 30 days) for disposal by Chem-Security Systems, Inc. All equipment used in this phase of the operation must be decontaminated to prevent cross contamination.

#### D. Restoration of the Site

The excavated soil will be backfilled in the following order:

- a. low-level contaminated gravel
- b. PCB-contaminated gravel (less than 10 ppm)
- c. clean gravel to the level of the surrounding area.

No other site restoration is necessary for this project.

#### E. Decontaminating Equipment

All equipment used during the cleanup, including shovels, will be wiped down three times with solvent, mineral spirits, or an industrial cleaning agent. Sorbent pads or plastic sheeting will be utilized under any equipment being decontaminated to prevent release of PCB-contaminated solvents. Such pads and sheeting will be disposed of as PCB waste.

### III. SAMPLING

#### A. Sampling will be performed by N&IS.

General sampling methods are described below.

#### 1. Soil Sampling

Samples will be collected by skimming the soil surface of each lift with a steel trowel or similar implement. The trowel will be wiped clean after each sample is collected. The soil or gravel will be collected by skimming the top 1 cm of surface in a specified 10-cm by 10-cm area. This should yield at least 100 g of gravel. If more soil is required for this sample, the area will be expanded without sampling deeper. The samples will be collected in 8-ounce glass jars which have been previously cleaned with solvents and heated in a muffle furnace at 320°C for a minimum of 24 hours. All jar tops will be fitted with Teflon liners. The samples will be stored at 4°C and analyzed as soon as possible.

#### 2. Field Blanks

Field blanks will be collected to demonstrate that the sample collection equipment has not been contaminated. A field blank will be generated by using the sampling equipment to collect a blank sample. The field blank will use the same sampling technique to collect a soil sample at a non-PCB-contaminated area.

#### 3. Identification of Samples

Each sample will be assigned a unique identification number upon collection. This number shall be traceable to the layer of soil from which the sample was collected. In addition, a sample data sheet will be prepared for each sample. This data sheet will describe the location, time of sampling, and other pertinent sample data. This data sheet will also serve as a formal chain-of-custody record and will be prepared by N&IS.

### IV. ANALYTICAL TECHNIQUES

WINCO labs will perform the necessary analytical techniques as per U.S. Environmental Protection Agency (EPA) Region 10 guidelines for the gas chromatographic method.

#### A. Summary of Method

The soil will be extracted with acetone in a Soxhlet extractor and the acetone evaporated to low volume, diluted with hexane, and dried over anhydrous sodium sulfate. After the hexane has been reduced in volume, it is passed through a Florisil gas column to separate the PCBs from background interference. Analysis of the extracts from the column is conducted with a gas chromatograph equipped with an electron-capture detector (GC/ECD).

B. Quality Control

Duplicate blanks and spiked samples will be used as quality control checks. WINCO labs will use a quality control check sample that has been supplied by the EPA Region 10 laboratory. Replicate samples will involve one sample from each batch of 20 being analyzed in triplicate. The sample will be divided into three replicate subsamples carried through the analytical procedure. The results of these analyses must be comparable within the limits required for spiked samples.

C. Quantitation

At least 10% of all calculations must be checked. The results should be manually checked after any changes in computer quantitation routines.

D. Documentation and Records

The laboratory is responsible for maintaining complete records of the analysis. Laboratory notebooks shall be used for handwritten records. Digital or other GC/MS data must be archived on magnetic tape, disk, or a similar device. Hard-copy printouts will also be kept by N&IS. Specific environmental data shall be retained indefinitely. QA records shall be maintained separately from sample analysis records.

The documentation must completely describe how the analysis was performed. Any variances from a standard protocol must be noted and fully described. Where a procedure lists options (e.g., sample cleanup), the option used and specific conditions (solvent volumes, digestion times, etc.) must be stated.

The remaining samples and extracts shall be archived for at least 2 months or until the analysis report is approved (whichever is longer) and then disposed of unless other arrangements are made. The magnetic disks or tapes, hard-copy chromatograms, hard-copy spectra, quantitation reports, work sheets, etc., must be archived for at least 3 years.

E. Reporting Results

Results of all analyses will be reported as micrograms of PCB per gram of soil sample and will be reported on a dry basis.

## V. SITE INSPECTION

Due to the isolated area in which the PCB spill has occurred and because it is in a restricted access area, EPA Region 10 will most likely not inspect this spill site during cleanup. However, the site will probably be inspected once after the site restoration has been completed. This inspection will most likely be performed during a routine inspection at the ICPP or at the INEL. This visit may involve sampling and independent analysis by EPA labs to ensure that a complete cleanup has been made.

## VI. FINAL DOCUMENTATION

Upon completion of the PCB spill cleanup, a final report will be prepared by Radiological and Environmental Safety (RES) and Projects. This report should include:

- . detailed descriptions of the location, approximate time period, and type of PCB spill,
- . a detailed description (including drawings) of the spill site and the boundaries of the spill,
- . descriptions of how the site was secured and cleaned up, including descriptions of all PCB-contaminated materials removed,
- . a detailed description of the mixed waste, including a description of the interim storage facility,
- . manifests for transportation and disposal of PCB-contaminated materials,
- . sampling methods used (including drawings) to obtain verification samples,
- . methods of sample analysis and results of the analyses, and
- . a description of how the site was restored.

Lockheed Martin Idaho Technologies Company

INTERDEPARTMENTAL COMMUNICATION

Date: February 17, 1998

To: Roger K. Jones MS 3921 6-8590

From: Dennis E. Raunig MS 3953 6-5501

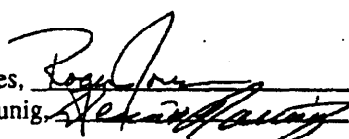
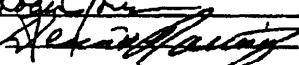
Subject: DISPOSITION OF AN INVESTIGATIVE DERIVED WASTE (IDW) - DER-001-98

The purpose of this letter is to document the methodology for disposition of an investigative derived waste (IDW) sample # IDW03001.

In the process of completing the Investigative Derived Waste (IDW) disposition project for WAG 3, analysis for PCBs was required for wastes from site CPP-61. Sample results indicated that the media was not hazardous and not TSCA regulated. However, one sample did reveal trace amounts of PCBs at concentrations less than the regulatory limit.

Per the requirements, specified in the laboratory master subcontract, the sample was returned to the INEEL. The existing hazardous waste determination for this site (CPP-61) is attached. The determination will be used as the basis to return the sample to the point of origin, (CPP-61). The sample has been placed in a TAA with a copy of the HWD and will remain there until disposition is completed. The PCB data is also attached as verification that the site is not TSCA regulated.

If you have questions, comments, or concerns please contact Dennis Raunig at 6-5501.

Approval: Roger K. Jones,  Date: 2-17-98  
Dennis E. Raunig,  Date: 2-17-98

jar

cc: R. Douglas Greenwell, MS 3953  
ARDC File, MS 3922  
File Code 6105  
Dennis E. Raunig File

1D  
PESTICIDE ORGANICS ANALYSIS DATA SHEET

EPA SAMPLE NO.

IDW03001

Lab Name: CEIMIC Contract: C96-180374  
 Lab Code: CEIMIC TOS No.: ER-TOS-743 Method: PCB8080 SDG No.: 2901  
 Matrix: (soil/water) SOIL Lab Sample ID: 8361-02  
 Sample wt/vol: 30.04 (g/ml) G Lab File ID: P1003-3DB608317  
 %Moisture: 4.81 decanted: (Y/N) N Date Received: 10/09/97  
 Extraction: (SepF/Cont/Sonc) SONC Date Extracted: 10/09/97  
 Concentrated Extract Volume: 10000 (uL) Date Analyzed: 10/17/97  
 Injection Volume: 1.00 (uL) Dilution Factor: 1.00  
 GPC Cleanup: (Y/N) N pH: 0.00 Sulfur Cleanup: (Y/N) N

CAS NO. COMPOUND CONCENTRATION UNITS:  
 (ug/L or ug/Kg) UG/KG Q

12674-11-2	Aroclor-1016	26.2	U
11104-28-2	Aroclor-1221	52.5	U
11141-16-5	Aroclor-1232	26.2	U
53469-21-9	Aroclor-1242	26.2	U
12672-29-6	Aroclor-1248	26.2	U
11097-69-1	Aroclor-1254	26.2	U
11096-82-5	Aroclor-1260	106	

FORM I PEST

3/90